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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RICHARD GIBSON and ROBERTO
MANZO,

Plaintiffs,

v.

CENDYN GROUP, LLC, THE RAINMAKER
GROUP UNLIMITED, INC., CAESARS
ENTERTAINMENT INC., TREASURE
ISLAND, LLC, WYNN RESORTS
HOLDINGS, LLC, BLACKSTONE, INC.,
BLACKSTONE REAL ESTATE PARTNERS
VII L.P., JC HOSPITALITY, LLC.

Defendants.

Case No. 2:23-cv-00140-MMD-DJA

**DECLARATION OF STEVE W.
BERMAN IN SUPPORT OF
PLAINTIFFS' MEMORANDUM OF
POINTS AND AUTHORITIES IN
OPPOSITION TO DEFENDANTS'
JOINT MOTION TO DISMISS THE
FIRST AMENDED COMPLAINT WITH
PREJUDICE**

1 I, Steve Berman, declare as follows:

2 1. I am the managing partner of Hagens Berman Sobol Shapiro LLP. Hagens Berman
3 is counsel for the Plaintiffs in this case. I have full knowledge of the matters stated herein and
4 could and would testify thereto.

5 2. Attached as Exhibit A is a true and correct copy of charts, for the years 2012 to
6 2023, comparing the difference between (1) the Casino Hotel Guestroom Purchaser Price Index
7 (“PPI”) and Casino Hotel PPI; and (2) the Non-Casino Hotel Guestroom PPI and Non-Casino
8 Hotel PPI.

9 3. Attached as Exhibit B is a true and correct copy of the Statement of Interest of the
10 United States in *Duffy v. Yardi Sys Inc. et al.*, No. 2:23-cv-01391-RSL, ECF No. 149 (March 1,
11 2024).

12 I declare under penalty of perjury under the laws of the United States that the foregoing is
13 true and correct. Executed this 6th day of March 2024, at Seattle, Washington.

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15 s/ Steve Berman
16 Steve W. Berman
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